23.   (New) Apparatus according to claim 21, ~~wherein the number of~~ records in the inflection store is smaller than the number of records in the lexical store.

REMARKS

Reconsideration and allowance in view of the foregoing amendments and the following remarks are respectfully requested. Currently, claims 1-23 are pending in this application.

Claim Objections:

Claim 14 was objected to as being in improper multiple dependent form. By this Amendment, claim 14 has been amended so that it is in proper form for U.S. practice. Applicant therefore respectfully requests that the objection to claim 14 be withdrawn.

Rejections Under 35 U.S.C. §112:

Claims 1-19 were rejected under 35 U.S.C. §112, second paragraph, "as being incomplete for omitting essential structural cooperative relationships of elements, such omission amounting to a gap between the necessary structural connections." Applicant submits that the claims include all necessary structural connections. For example, claim 1 requires, "a processor having at least read access to the lexical store, the rule store and the transaction store..." and independent claim 17 requires, "a processor operatively coupled to an input so that said processor." Also, a proper antecedent basis has been provided for the limitation "the target language." Applicant therefore respectfully requests that the rejection of claims 1-19 under 35 U.S.C. §112, second paragraph be withdrawn.

Rejections Under 35 U.S.C. §102:

Claims 1-19 were rejected under 35 U.S.C. §102(e) as allegedly being anticipated by Morin et al (U.S. '841, hereinafter "Morin"). Applicant respectfully traverses this rejection.

For a reference to anticipate a claim, each element must be found, either expressly or under principles of inherency, in the reference. Applicant respectfully submits that Morin fails to disclose all of the claimed limitations. In particular, Morin fails to disclose a transaction store containing data relating to allowable transactions between a user and another person, or training the user to engage in transactions with another person as required by independent claim 1 and its dependents.

With respect to dependent claim 2, Applicant respectfully submits that Morin fails to disclose a first set of rules and a second set of rules which corresponds to one of the first rules but with one relationship criterion relaxed. The claimed training apparatus is thus allowed to use both sets of rules against an input dialogue. If the next Office Action maintains the rejection of claim 2, Applicant respectfully requests that the next Office Action specifically point out where (i.e., what column and line number(s) and/or what figure(s)) discloses this limitation.

With respect to independent claim 17 and its dependents, Applicant respectfully submits that Morin fails to disclose a language training apparatus that generates responsive output dialogue in the target language and also generates a separate indication of the presence of the error. Through this feature, the present

invention provides two different ways of responding to input dialogue containing an error.

Accordingly, Applicant respectfully submits that the above rejection of claims 1-19 in view of Morin be withdrawn.

Claims 17-19 were rejected as allegedly being anticipated by Berger et al (U.S. '981, hereinafter Berger). Applicant respectfully traverses this rejection.

Berger discloses a translation between source words in a first language and target words in a second language. In contrast, independent claim 17 and its dependents require accepting input dialogue in the target language and generating responsive output dialogue also in the target language. Accordingly, claim 17 involves only the target language, while Berger discloses performing a translation between two different languages with a measure of accuracy. Furthermore, Berger fails to generate "responsive output dialogue" as required by claim 17.

Accordingly, Applicant respectfully requests that the rejection of claims 17-19 in view of Berger be withdrawn.

New Claims:

New claims 20-23 have been added. Since new claims 20-23 depend, at least indirectly, from independent claim 1, Applicant respectfully submits that these new claims are allowable for at least the reasons noted above.
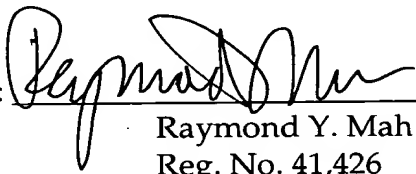
Conclusion:

Applicant believes that this entire application is in condition for allowance and respectfully requests a notice to this effect. If the Examiner has any questions or believes that an interview would further prosecution of this application, the Examiner is invited to telephone the undersigned.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____

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